

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF KENTUCKY  
CENTRAL DIVISION AT LEXINGTON

Garey E. Lindsay, Regional Director of  
the Ninth Region of the National Labor  
Relations Board, for and on behalf of  
the National Labor Relations Board

Petitioner,

vs.

Leggett & Platt, Inc.,

Respondent.

Civil Action No. 5:17-198-KKC

Judge Karen K. Caldwell

**DECLARATION OF MICHAEL ROBINSON**

I, Michael Robinson, hereby depose and stated as follows:

1. I am making this declaration voluntarily. I understand that my position at Leggett & Platt, Inc. ("Company") is in no way affected by me making this declaration. I have not been promised anything of benefit by Company for making this declaration, and I have not been threatened by Company in any way in connection with this declaration. I was assured by Company that I was free to give this declaration or not, without promise of benefit, threat of reprisal or any other impact on my employment. I understand that this declaration concerns the circumstances surrounding the signing of a pro-union petition, and may be introduced into evidence in a case between the Company and the NLRB.

2. I work at the Company's Winchester plant (plant #002), and have been represented by the International Association of Machinists Union, Local 619 ("Union").

3. I saw a notice on the Union's bulletin board at the plant announcing a meeting scheduled for January 18, 2017 at the Union hall to discuss strike pay and insurance benefits during a strike. This posting has since been taken down. I attended the meeting. At the meeting, I signed the document attached as Exhibit A because I understood that I had to sign it in order to get strike pay and insurance benefits. The document I signed on January 18 did not state, "We the undersigned members of the International Association of Machinists and Aerospace Workers, Local Lodge 619, support the Union at Leggett & Platt, Inc." at the top of the page. Rather, the top of



the page was blank. It appears to me that the language at the top of the page on Exhibit A was added after I signed it.

I declare under penalty of perjury that the foregoing is true and correct. This Declaration was executed in the county of Clark, State of Kentucky, on this 22 day of May 2017.

  
\_\_\_\_\_  
Michael Robinson

We the undersigned members of the International Association of Machinists and Aerospace Workers, Local Lodge 619, support the Union at Leggett & Platt, Inc.

<u>Print Name</u>	<u>Sign Name</u>	<u>Date</u>
1) Jerry Kirby	Jerry Kirby	1-18-17
2) Marvin Berry	Marvin Berry	1-18-17
3) Jess - Pennis	Jess Pennis	1-18-17
4) Brian Pat	Brian Pat	1-18-17
5) Jose L. Perin	Jose L. Perin	1-18-17
6) Cecil Gross	Cecil Gross	1-18-17
7) Henry Hollow	Henry Hollow	1-18-17
8) Michael Robinson	Michael Robinson	1-18-17
9) Wilfred Havens	Wilfred Havens	1-18-17
10) Jack Keith	Jack Keith	1-18-17
11) Timothy J Brunt	Timothy J Brunt	1-18-17
12) Reed Combs, Jr.	Reed Combs, Jr.	1-18-17
13) CARL STEWARD	Carl Steward	1-18-17
14) THOMAS THORPE	Thomas Thorpe	1-18-17
15) Stephen Hollow	Stephen Hollow	1-18-17
16) Stephen Lutz Jr	Stephen Lutz Jr	1-18-17
17) Brandy Stone	Brandy Stone	1-18-17
18) JAMES H. FUGATE	James H. Fugate	1-18-17
19) Glen Dixon	Glen Dixon	1-18-17
20) Michael Scott Bauman	Michael Scott Bauman	1-18-17

